

UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: \* CHAPTER 13  
MICHAEL WOODS \* BANKRUPTCY NO. 18-17712  
\*  
Debtor \*

**ORDER**

AND NOW, this day of , 201 , upon consideration of The Bank Of New York Mellon's Motion for Relief from the Automatic Stay and Debtors' answer thereto, and after hearing, it is hereby ORDERED and DECREED that;

The Motion of The Bank of New York Mellon for Relief From The Automatic Stay Under Section 362 is DENIED.

BY THE COURT:

---

J.

Kenneth G. Harrison, Esquire  
Fine Neshaminy Interplex Suite 115  
Trevose, PA 19053

William C. Miller, Esquire (Trustee)  
P.O. Box 40119  
Philadelphia, PA 19106

Kevin G. McDonald, Esquire  
KML Law Group  
701 Market Street  
Suite 5000  
Philadelphia, PA 19106-1532

UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: \* CHAPTER 13  
MICHAEL WOODS \* BANKRUPTCY NO. 18-17712  
\*  
Debtor \*

**DEBTORS' ANSWER TO THE MOTION  
FOR RELIEF FROM THE AUTOMATIC STAY**

Debtor, Michael Woods, by and through his attorney, Kenneth G. Harrison, Esquire, respectfully represents as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Denied. No mortgage foreclosure proceedings were filed prior to the filing of this bankruptcy petition. Debtor has no knowledge of Movant's future actions in this matter.
7. Denied. Debtor have made the July and August payment.
8. Denied. Debtors have no knowledge of the amount to reinstate, if any.
9. Denied. Debtor owes only the current month payment plus \$50.00.
10. Denied as a conclusion of law upon which no responsive pleading is required.
11. Denied as a conclusion of law upon which no responsive pleading is required.
12. Denied as a conclusion of law upon which no responsive

pleading is required.

DEFENSES

1. The Debtor has substantial equity in their property and movant has been afforded adequate protection of its interest.
2. Movant has not shown the irreparable harm necessary to justify lifting of the automatic stay with respect to its foreclosure.
3. If movant is entitled to relief from the stay, the stay should not be terminated and the Court should grant less drastic relief by conditioning or modifying the stay.

WHEREFORE, Debtor, Michael Woods, respectfully requests that this Honorable Court deny Movant's Motion for Relief From the Automatic Stay.

Respectfully submitted,

s/s Kenneth G. Harrison  
Kenneth G. Harrison, Esquire  
Five Neshaminy Interplex Suite 115  
Trevose, PA 19053